

MEMO ENDORSED

STEPHEN J. LIAKAS*
DEAN N. LIAKAS
NICHOLAS LIAKAS

ANTHONY M. DELISO
STEPHANIE M. GALLO*
JOSEPH GUARDINO*
NICHOLAS MINDICINO
SCOTT A. STEINBERG
JOSHUA VERSOZA
PAVLO PAVLATOS

PAUL V. PRESTIA**

*Also admitted in New Jersey

**Special counsel



Liakaslaw.com
65 Broadway
13th Floor
New York, NY 10006

P: (212) 937-7765
F: (877) 380-9432

New Jersey Office
576 Main Street, Suite C
Chatham, NJ 07928

June 1, 2021

VIA ECF

Hon. Kenneth M. Karas
The Hon. Charles L. Brieant Federal
Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

RE: The Estate of Cachin Anderson v. Wood et al
20-cv-01985-KMK

Your Honor,

My office represents Plaintiff in the above referenced matter. Per Your Honor's order, this matter was stayed for 60 days beginning on April 2, 2021. I write today to request this matter continue to be stayed for another 60 days, pending approval of a proposed global settlement reached in the related Court of Claims matter.

The Estate of Cachin Anderson has filed this action, as well as a related action in the Court of Claims, under Claim Number 130536. My office has been engaged in negotiations with the New York State Attorney General's Office regarding global resolution of these actions. An agreement in principle has now been reached wherein the parties would settle the Court of Claims action, and discontinue the action before this Court with prejudice. That settlement agreement must be approved by the Court in which the action is pending, pursuant to NY EPTL § 5-4.6.

A hearing was scheduled before The Hon. J. David Sampson of the New York State Court of Claims, on May 17, 2021 regarding the proposed settlement. Plaintiff submitted motion papers seeking approval of the proposed settlement. However, Judge Sampson asked Plaintiff to submit additional/revised briefing before going forward with the hearing. Those revised papers are being prepared now, and I hope to file them within the next few days, at which time Judge Sampson will schedule another hearing date.

If the settlement in the Court of Claims is approved, this action would be discontinued with prejudice. Accordingly, it would serve judicial economy to stay this matter pending the approval of the proposed settlement, rather than proceed with discovery. Plaintiff therefore requests that the stay of this matter be continued for another 60 days in the hope that the Court of Claims will have completed its hearing and issued a decision by that time. If so, and if approval is granted, the parties will be able to file a discontinuance of this action in short order thereafter.

Neil Shevlin consents to this requests on behalf of defendants Parker, Wood and Putkowski.
Helene Hechtkopf consents on behalf of defendant Forest.

Thank you for your consideration,

Granted.

So Ordered.



6/1/21

Yours,



Nicholas Mindicino
Liakas Law, P.C.